

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:) In Proceedings Under Chapter 11
)
DOUBLE HELIX CORPORATION,) Case No. 25-40745
d/b/a KDHX COMMUNITY MEDIA,)
)

MOTION TO EXPEDITE HEARING ON FIRST DAY MOTIONS

COMES NOW Double Helix Corporation d/b/a KDHX Community Media, as Debtor and Debtor in Possession (“Debtor”) by and through its undersigned counsel, files its *Motion to Expedite Hearing on Application to Employ Debtors’ Counsel, Motion for Order Authorizing Payment of Prepetition Wages, Salaries, Reimbursable Employee Expenses, and Other Employee Benefits, Debtor’s Motion for Entry of an Order Authorizing Debtor to Maintain Cash Management System, Motion For Authority To Perform Obligations Necessary To Maintain Existing Insurance, and Debtor’s Emergency Motion For An Order Pursuant To Sections 105(A) And 366(B) Of The Bankruptcy Code (I) Prohibiting Utility Companies From Altering, Refusing Or Discontinuing Utility Services; (II) Deeming Utility Companies Adequately Assured Of Future Performance*, (the “Motion to Expedite” and “Motions”) pursuant to E.D. Mo. L.B.R. 9013-2. In support thereof, Debtor respectfully states as follows:

1. Debtor has filed the Motions and hereby seeks a hearing thereon on or prior to March 17, 2025 at 11:00 a.m.. if the Court has availability. Capitalized terms used in this Motion to Expedite but not defined herein shall have the meanings ascribed to them by the Motions.

2. Debtor seeks a hearing on the Motions on an expedited basis to the extent an order granting such relief is required. The relief requested in the Motions is necessary to avoid harm to Debtor’s ability to reorganize and to operate in the ordinary course of business.

WHEREFORE, Debtor hereby respectfully request the Court enter an Order granting this Motion to Expedite Hearing and setting the *Motion to Expedite Hearing on Application to Employ Debtors' Counsel, Motion for Order Authorizing Payment of Prepetition Wages, Salaries, Reimbursable Employee Expenses, and Other Employee Benefits, Debtor's Motion for Entry of an Order Authorizing Debtor to Maintain Cash Management System, Motion For Authority To Perform Obligations Necessary To Maintain Existing Insurance, and Debtor's Emergency Motion For An Order Pursuant To Sections 105(A) And 366(B) Of The Bankruptcy Code (I) Prohibiting Utility Companies From Altering, Refusing Or Discontinuing Utility Services; (II) Deeming Utility Companies Adequately Assured Of Future Performance*, and any responses thereto for expedited hearing on or prior to March 17, 2025, or as soon thereafter as counsel may be heard, and providing for such other and further relief as this Court deems just and proper.

Respectfully submitted,

CARMODY MACDONALD P.C.

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